

EXHIBIT D

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KASHIF ALLEYNE, DERRICK LOUIGARDE, and
DAMANI MCFARLANE,

Plaintiffs,

-against-

CITY OF NEW YORK, JOHN and JANE DOE 1 through
10, individually and in their official capacities (the names
John and Jane Doe being fictitious, as the true names are
presently unknown),

Defendants.
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**DEFENDANT CITY'S
DISCLOSURES PURSUANT
TO FED R. CIV. P.
26(A)(1)(A)**

15 CV 01860 (WFK)(VMS)

PLEASE TAKE NOTICE, that defendant City of New York, by its attorney, Zachary W. Carter, Corporation Counsel of the City of New York, pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure, hereby submits for its initial disclosures that:

i. The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment. Information, currently known, regarding individuals who may have knowledge of the events set forth in the complaint may be obtained from the documents attached hereto, as well as the following, to wit:¹²

1. Plaintiff, Kashif Alleyne;
2. Plaintiff, Derrick Louigarde;
3. Plaintiff, Damani McFarlane;

¹ Defendant requests that all communications with police officers regarding the incident alleged in the complaint or this lawsuit, other than service of process, be made through counsel.

² The names, date of births, addresses, and other identifying information for co-arrestees S.H., and M.A. have been redacted as that information may be sealed pursuant to N.Y.C.P.L. §160.50/55.

4. S.H., co-arrestee;
5. M.A., co-arrestee;
6. Detective Waliur Rahman, Shield No. 6428, Brooklyn North Narcotics, 1 Police Plaza, New York, NY;
7. Individuals not yet identified;
8. Defendant also incorporates any individual identified by plaintiffs in their Rule 26(a)(1)(A)(i) disclosures and any individuals mentioned in the documents annexed hereto

ii. A copy of, or a description by category and location of, all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless solely for impeachment. On information and belief, the relevant documents currently known to exist are identified below and annexed hereto:

1. NYPD Arrest Report for plaintiff Kashif Alleyne: Bates Nos. D 1-3;
2. NYPD Online Prisoner Arraignment Form (Alleyne): Bates Nos. D 4-5;
3. NYPD Arrest Report for plaintiff Damani McFarlane: Bates Nos. D 6-8;
4. NYPD Online Prisoner Arraignment Form (McFarlane): Bates Nos. D 9-10;
5. NYPD Arrest Report for plaintiff Derrick Louigarde: Bates Nos. D 11-13;
6. NYPD Online Prisoner Arraignment Form (Louigarde): Bates Nos. D 14-15;
7. NYPD Complaint Report: Bates No. D 16-17;
8. Documents from Criminal Court of City of New York, Kings County (Alleyne): Bates No. D 18-22;
9. Documents from Criminal Court of City of New York, Kings County (McFarlane): Bates No. D 23-27;
10. Documents from Criminal Court of City of New York, Kings County (Louigarde): Bates No. D 28-44;
11. Search Warrant #730/14: Bates Nos. D 45;

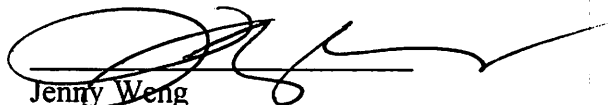
12. NYPD Property Clerk Invoice No.: 3000446237: Bates Nos. D 46-47;
13. NYPD Field Test Report for Voucher No. 3000446237: Bates Nos. D 48;
14. Criminal Court affidavit for plaintiff Alleyne: Bates Nos. D 49;
15. Search Warrant #732/14: Bates Nos. D 50;
16. NYPD Property Clerk Invoice No.: 3000446307: Bates Nos. D 51;
17. NYPD Property Clerk Invoice No.: 3000446232: Bates Nos. D 52-53;
18. NYPD Property Clerk Invoice No.: 3000446256: Bates Nos. D 54;
19. NYPD Property Clerk Invoice No.: 3000446248: Bates Nos. D 55-56;
20. NYPD Property Clerk Invoice No.: 3000446266: Bates Nos. D 57-58;
21. NYPD Field Test Report for Voucher No. 3000446256: Bates Nos. D 59;
22. NYPD Field Test Report for Voucher No. 3000446248: Bates Nos. D 60;
23. NYPD Field Test Report for Voucher No. 3000446232: Bates Nos. D 61;
24. Criminal Court affidavit for plaintiff McFarlane: Bates Nos. D 62
25. Documents not yet identified;
26. Defendant also incorporates any documents identified by plaintiffs in their initial disclosures.

- iii. Computation of damages:
Not applicable.
- iv. Any insurance agreements:
Not applicable.

Dated: New York, New York
July 31, 2015

ZACHARY W. CARTER
Corporation Counsel of the
City of New York
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(212) 356-2648

By:

A handwritten signature in black ink, appearing to read 'Jenny Weng', is written over a horizontal line.

Jenny Weng
Senior Counsel
Special Federal Litigation Division

To: VIA FIRST CLASS MAIL
Robert Marinelli, Esq.
Attorney for Plaintiffs